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PLEASE SEND MAIL TO 103 EISENHOWER PARKWAY SUITE 400, ROSELAND, NJ 07068 FOR PROCESSING

May 12, 2023

VIA ECF

The Honorable James B. Clark, III, U.S.M.J.
United States District Court,
District of New Jersey, Newark Venue
50 Walnut Street, Room MLK2A
Newark, New Jersey 07101

Re: The Trustees of the Stevens Institute of Technology v. iModalGround, LLC et al
Docket No.: 2:22-CV-04411-JXN-JBC
Our File No.: STEVENS-001

Dear Judge Clark:

As Your Honor is aware, we represent the Plaintiff, The Trustees of the Stevens Institute of Technology (hereinafter “Plaintiff”), a non-profit educational institution, in the above-referenced action for recovery of approximately \$3.3 Million from the Defendants, iModalGround, LLC and Inter-Modal Holdings, LLC (hereinafter “Defendants”).

Currently, the parties have a Video Settlement Conference before Your Honor set for 2:00 p.m. on Monday, May 15, 2023. This past Wednesday afternoon, May 10, 2023, Defendants supplied a counteroffer to continue settlement negotiations; however, Plaintiff has requested additional information regarding specifics of the presented counteroffer. Accordingly, the parties submit this joint request to adjourn the pending Video Settlement Conference with Your Honor to address the counteroffer presented by Defendants.

Should Your Honor require any further information, please do not hesitate to contact the undersigned.

Respectfully submitted,

/s/ Jason R. Mischel
JASON R. MISCHEL
Attorneys for Defendants

/s/ Matthew B. Sicheri
MATTHEW B. SICHERI
Attorneys for Plaintiff

MBS/ao